

COMP

Alexander P. Yanko in Pro Per
 9001 Cape Wood Ct Las Vegas, NV 89117
 United States District Court
 Clark County, Nevada

Alexander P. Yanko

Plaintiff,

vs.

Wellpath LLC
 Does 1-10 inclusive,
 Defendant

Business Roes 1-10 inclusive

2:22-cv-01311-GMN-DJA

Case No.:

Dept. No.:

Docket No.:

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<input type="checkbox"/> ENTERED	<input type="checkbox"/> SERVED ON
COUNSEL/PARTIES OF RECORD	
AUG 15 2022	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: <u>lee</u>	DEPUTY

Complaint

Plaintiff, Alexander P. Yanko in proper person
 complains against the defendant, Wellpath
 LLC, Does 1-10 inclusive, and Business Roes 1-10
 inclusive as follows:

I Parties

1. Plaintiff, Alexander P. Yanko, (hereinafter Plaintiff), who is currently, and was at all relevant times, a resident of The State of Nevada, County of Clark, City of Las Vegas.
2. Defendant, Wellpath, LLC, (hereinafter Defendant Wellpath), is a Delaware corporation, based in Nashville, TN, licensed to do business in The State of Nevada, County of Clark, City of Las Vegas.

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3. All the acts, and or failures to act alleged herein, were duly performed by, and or are attributable to defendants, individually, or acting by and through their agents and employees. Said acts, and or failures to act, were within the scope of any agency or employment, or were ratified by defendants.

4. The names and capacities, whether individual, corporate, associate, or otherwise of defendants and/or their alter egos sued herein as Docs 1-10 inclusive and Business Docs 1-10 inclusive, are presently unknown, and Plaintiff will amend this complaint to insert the name(s) when ascertained.

II. Facts

5. Since the day Wellpeth took over the medical department at the Clark County Detention Center on July 1, 2019, they as a unit have showed deliberate indifference to Plaintiff's pain and suffering.

6. Plaintiff is a diabetic, who, on the street maintains his health through healthy diet.

7. Now under Wellpeth, the defendants, he takes up to three shots of insulin a day and approximately thirty or more pills a day. X

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8. All the while his diabetes has gotten worse.

9. But more importantly his pain due to neuropathy has progressed to an almost intolerable level.

10. Plaintiff, over the years has sent over five-hundred communications (faxes) to Wellpath, the defendant, begging for help to no avail.

11. Plaintiff is in incredible pain due to this neuropathy yet the defendant refuses to give him the proper treatment to ^{give} relieve the pain.

12. Defendant has ^{given} him a minimum dosage of Gabapentin, a nerve blocker used to treat neuropathy.

13. No matter how much Plaintiff brings the defendant's attention to his suffering they do nothing except to say, "Please discuss this at your next chronic pain consultation."

14. At the chronic pain consultation they say, "Yeah sure" then do nothing.

15. Defendant has shown deliberate indifference to all of Plaintiff's health issues.

16. Why else would he go from no shots to three or more shots a day?

17. Why else would his neuropathy start deteriorating to the point it keeps him up all night long.

18. Why does defendant refuse to raise the amount of Rehabilitation the Plaintiff is given when they know it is a safe, tried, and true way to alleviate the pain of neuropathy.

19. Just for the record, Neuropathy is the nerves dying in the feet, legs, hands, and arms. The pain cannot be described but has to be felt to have someone understand.

20. The fact is Defendant Wellpath does ^{not} care about Plaintiff or any of their patients.

21. Defendant Wellpath only cares about the bottom line.
III Claims for Relief

22. The claim is simple, "Deliberate Indifference." Defendant Wellpath simply does not care if Plaintiff is in pain or not.

23. nor do they feel for him that Plaintiff get better. Then they wouldn't be able to stick the county for his medical care.

IV Prayer for Relief

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1. Plaintiff wants for and a half million dollars (\$4,500,000-). One million for each year he's had to endure this mistreatment
2. Ten million punitive damages (\$10,000,000-)
3. For interest at the statutory rate, (and)
4. For such other and further relief as this Court deems just and equitable.

DATED THIS 25 day of June, 2022

I, Alexander P. Yenko, do

solemnly swear, under the penalty of perjury, that

the above Complaint is accurate,

correct, and true to the best of my knowledge.

NRS 171.102 and NRS 208.165.

Respectfully submitted.

Alexander P. Yenko
~~Defendant~~
 Plaintiff

NRS 208.165 A prisoner may execute any instrument by signing his name immediately following a declaration "under penalty of perjury" with the same legal effect as if he had acknowledged it or sworn to its truth before a person authorized to administer oaths. As used in this section, "prisoner" means a person confined in any jail or prison, or any facility for the detention of juvenile offenders in this state.

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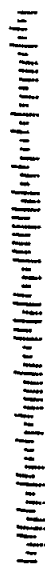
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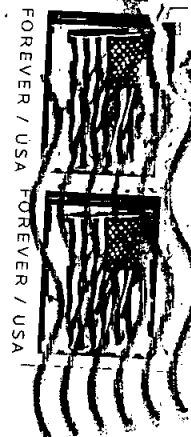
Alex Yankov
9801 Cape Wood Ct
LV, NV 89117

US District Court
333 S Las Vegas Blvd
LV, NV 89101

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